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VIA ECF AND E-MAIL (CA02_RJSChambers@ca2.uscourts.gov)

Hon. Richard J. Sullivan
United States Circuit Judge
500 Pearl St., Room 2530
New York, New York 10007

Re: Oakley v. MSG Networks, Inc., et al., 17-cv-6903 (RJS)

Dear Judge Sullivan:

I write as Defendants' counsel, pursuant to Your Honor's Rule 1(C), to request that Defendants' time to serve their answer to Plaintiff Charles Oakley's Amended Complaint be stayed and extended to, and including, Monday, January 11, 2021. Plaintiff's counsel has consented to this request, and this is our first request for such an extension.

Plaintiff's counsel is still considering our further request to stay our clients' obligation to answer until after disposition of Defendants' summary judgment motion, which we believe would be consistent with this Court's recent order staying discovery (Dkt. No. 90), and consistent with the effect that a dispositive motion would typically have (*see Rashidi v. Albright*, 818 F. Supp. 1354, 1357 (D. Nev. 1993) ("Reasons exist for the postponement of the responsive pleading until the determination of a motion for summary judgment which will be entirely dispositive of the action if the rules are construed as required by Fed. R. Civ. P. 1 to secure the just, speedy and inexpensive determination of every action.")).

As always, we appreciate the Court's consideration of this request.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All Counsel of Record (via ECF)